

RS**RENAKER
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DATE FILED: 11/13/2023

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November 8, 2023

Via ECFJudge Colleen McMahon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312**Re: Disberry v. Employee Relations Committee, et al.
Case No. 22-Civ-5778 (CM)**

Dear Judge McMahon,

Pursuant to the Southern District of New York Electronic Case Filing Rules & Instructions (Section 6: Filing Under Seal and Redacting in Civil and Miscellaneous Cases), Plaintiff files this Letter Motion to Seal documents attached to the Declaration of Kirsten Scott in Support of Plaintiff's Motion for Summary Judgment ("Scott Dec."), which will be filed shortly. Specifically, this Letter Motion pertains to the following exhibits attached to the Scott Dec. and filed under seal:

- (1) Exhibit 1 (EBC_000253-272)
- (2) Exhibit 5 (EBC_003407-10)
- (3) Exhibit 6 (EBC_003411)
- (4) Exhibit 8 (ALIGHT001681-96)
- (5) Exhibit 9 (ALIGHT001697-1706)
- (6) Exhibit 10 (ALIGHT001387-1406)
- (7) Exhibit 12 (EBC_000766-820)
- (8) Exhibit 15 (ALIGHT001153-1213)
- (9) Exhibit 16 (ALIGHT001117-52)
- (10) Exhibit 17 (ALIGHT002126-27)
- (11) Exhibit 18 (EBC_001537-1706)
- (12) Exhibit 21 (ALIGHT001239-41)
- (13) Exhibit 24 (ALIGHT002126-27)
- (14) Exhibit 25 (ALIGHT002341-2350)
- (15) Exhibit 31 (EBC_001388-1391)
- (16) Exhibit 33 (ALIGHT002949-2952)
- (17) Exhibit 34 (ALIGHT003177-78)
- (18) Exhibit 35 (ALIGHT002688-2702)

11/9/2023
 You may file
 these documents under
 seal and redact
 relevant portions
 of the moving papers.
 You MUST provide
 me with hard copies
 of these documents
 and a hard
 copy of

UNREDACTED
 Brief, marked
 as sent
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Each of the documents with the "EBC" Bates number prefix was produced in this case by Defendant Employee Relations Committee of the Colgate-Palmolive Company (the "Committee"), and stamped confidential by the Committee. Each of the documents with the "ALIGHT" Bates number prefix was produced in this case by Defendant Alight Solutions LLC ("Alight") and stamped "confidential" by Alight. Plaintiff is filing these documents under seal pursuant to the Committee and Alight's marking of these documents as confidential, pursuant to the Protective Order in this case (ECF 86). Pursuant to Your Honor's Individual Practices and Procedures (Sections I(A) and V), Plaintiff is filing these documents under seal electronically on CM/ECF. However, Plaintiff does not take the position that any of these documents need to be restricted from the public record.

Sincerely,

RENAKER SCOTT LLP

By:



Kirsten Scott

kirsten@renakerscott.com